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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ROSHONDA MAYFIELD,

Plaintiff,

v.

CAPITAL ONE BANK, N.A.; JPMORGAN  
CHASE BANK, N.A.; EXPERIAN  
INFORMATION SOLUTIONS, INC;  
EQUIFAX INFORMATION SERVICES,  
LLC; and TRANS UNION, LLC,

Defendants.

Case No.: 2:17-cv-03097-RFB-PAL

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**[SECOND REQUEST]**

Defendant, JPMorgan Chase Bank, N.A. (“JPMC”), by and through its undersigned counsel of record, and Plaintiff, Roshonda Mayfield (“Plaintiff”) (collectively, the “Parties”),<sup>1</sup> by and through her respective counsel of record, and pursuant to Local Rules 7-1 and 26-4, hereby stipulate and agree to extend the deadlines contained in the Order Granting the Stipulation to (I) Stay Discovery for a Limited Time; and (II) Continue Case Management Deadlines [Doc. 47] for a period of 90 days for the reasons set forth herein.

<sup>1</sup> Defendants Capital One Bank, N.A., Experian Information Solutions, Inc., Equifax Information Services, LLC, and Trans Union, LLC have all been dismissed from this action. Plaintiff and JPMC are the only remaining parties.

**I. DISCOVERY COMPLETED TO DATE**

1. On February 16, 2018, Plaintiff served JPMC with written discovery requests, including interrogatories, requests for admission, and requests for production. JPMC served its responses to Plaintiff's discovery requests on May 3, 2018.

2. On April 6, 2018, the Court entered an Order Granting the Parties' Stipulation and Order to (I) Stay Discovery for a Limited Time; and (II) Continue Case Management Deadlines [Doc. 47].

3. On April 26, 2018, JPMC served its initial document and witness disclosures.

4. On May 3, 2018, JPMC served its first supplemental document and witness disclosures.

5. On July 11, 2018, JPMC served Plaintiff with written discovery requests, including interrogatories, requests for admissions, and requests for production.

The Parties plan to continue to propound and respond to written discovery, to take depositions of relevant parties and witnesses, and to identify and produce relevant documents and witnesses in this matter.

**II. REASON FOR EXTENDING DEADLINES; GOOD CAUSE**

The Parties have been engaged in lengthy settlement discussions for two months but have not yet been able to reach a resolution. On June 5, 2018, Plaintiff filed a First Supplemental Complaint against JPMC [Doc. 59]. On July 20, 2018, JPMC filed a Partial Motion to Dismiss as to the Second Cause of Action in the First Supplemental Complaint [Doc. 64].

In order to allow additional time for settlement discussions to continue and pending the outcome of JPMC's Partial Motion to Dismiss, the Parties hereby respectfully request an extension of the remaining discovery deadlines for a period of 90 days. The Parties' joint request to extend the deadlines in this matter is made in good faith and good cause exists for such an extension. This request is not made for purposes of delay.

**III. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY**

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Discovery cutoff	August 15, 2018	<b>November 13, 2018</b>
Deadline to amend pleadings	May 17, 2018	<b>August 15, 2018</b>
Deadline to file interim status report	June 18, 2018	<b>September 17, 2018</b>

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Deadline for initial expert disclosures	June 18, 2018	<b>September 17, 2018</b>
Deadline for rebuttal expert disclosures	July 18, 2018	<b>October 16, 2018</b>
Deadline to file dispositive motions	September 14, 2018	<b>December 13, 2018</b>
Deadline to file joint pretrial order	October 15, 2018	<b>January 14, 2019</b>

Based on the foregoing stipulation and good cause appearing, the Parties respectfully request that the Court enter an Order adopting the Parties' proposed schedule for completing all remaining discovery and deadlines.

**IT IS SO STIPULATED.**

DATED this 23rd day of July, 2018.

GREENBERG TRAURIG, LLP

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DATED this 23rd day of July, 2018.

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*Counsel for Plaintiff Roshonda Mayfield*

**IT IS SO ORDERED.**

**IT IS FURTHER ORDERED** that no further extensions will be allowed whether or not the parties are still negotiating and/or the pending motion to dismiss has been decided.

  
UNITED STATES DISTRICT JUDGE /  
UNITED STATES MAGISTRATE JUDGE

**DATED:** August 17, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of July, 2018, a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES [SECOND REQUEST]** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Shayna Noyce

An employee of Greenberg Traurig, LLP